

THE SMALL BUSINESS ADVOCATE

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When Agencies Are Challenged, Chief Counsel for Advocacy Weighs In

With the power granted by Congress, small businesses are taking federal agencies to court to challenge their compliance with the Regulatory Flexibility Act (RFA). Chief Counsel for Advocacy Jere W. Glover has weighed in with federal agencies on many of the disputes, thereby bolstering the small business position.

"We are seeing some significant results," said Glover. "Finally, federal agencies realize they must seriously address the impact that their regulations have on small businesses. The court dockets prove that more rigorous enforcement of the Regulatory Flexibility Act was long overdue."

The Small Business Regulatory Enforcement Fairness Act of 1996

amended the RFA and granted small businesses the right to seek judicial review of federal agencies' compliance with the act. To complement that right, Congress reaffirmed the chief counsel for advocacy's authority to file *amicus curiae* (friend of the court) briefs with the reviewing court in support of small businesses. The chief counsel recently intervened as an *amicus curiae* in a case against the Bureau of Land Management. (See story in the January/February 1997 issue of *The Small Business Advocate* for details.)

Outside the courtroom, Glover also brings his independent view to bear on agencies in order to help small businesses. For example, in recent challenges to regulations

Continued on page 2



The federal courthouse in Washington, D.C. — the setting for some recent challenges to federal regulations by small business advocacy groups.

Weighing In, from page 1

proposed by the Occupational Safety and Health Administration (OSHA) and the Federal Aviation Administration (FAA), the chief counsel's participation helped persuade the agencies to address the concerns of small businesses.

OSHA Offers Compromise

In March 1997, small businesses filed a suit in the U.S. Court of Appeals for the D.C. Circuit against OSHA, seeking to remand a new OSHA standard for occupational exposure to methylene chloride and complaining that the agency failed to comply with the RFA. Working with OSHA, and supported by the Office of Advocacy, these small business groups now expect that OSHA will reopen the record in an effort to relieve the costly impact of the rule on small firms. This was a hard-won solution, but it clearly shows the power of small businesses.

"We urged OSHA to work with small business organizations to reach an agreement," said Chief Counsel Glover. "Our opinions were on the record about this rule-making, so the agency knew we felt very strongly that a compromise was needed before it reached the court."

Asserting that OSHA was in violation of the RFA, small businesses from the furniture refinishing and foam manufacturing industries petitioned the secretary of labor and the U.S. Court of Appeals in the summer of 1997 to stop implementation of the methylene chloride rule (*Benco Sales, Inc., et al. v. OSHA*, docket no. 97-1171). In the filings, the petitioners referenced a letter from the chief counsel for advocacy to OSHA that urged the agency to "develop flexible alternatives for small firms affected by this rule-making, beyond micro-businesses with less than 20 employees." In support of the small businesses' case, Chief Counsel Glover also wrote to OSHA, urging a stay of

Off to Court

The Office of Advocacy has lent its voice to several proceedings challenging rulemakings by federal agencies. Here are some recent instances.

- **January 1998:** the Office of Advocacy files as *amicus curiae* in a suit brought against the Bureau of Land Management, to enjoin enforcement of certain mining regulations (*Northwest Mining v. Babbitt*).
- **December 1997:** OSHA announces delay in implementation of a rule on exposure to methylene chloride, after court filing from business coalition citing Advocacy letter (*Benco Sales v. OSHA*).
- **November 1997:** To avoid an *amicus* filing by the Office of Advocacy, the Department of Justice admits before the U.S. Court of Appeals that the FAA has erroneously certified that a rule would not have a significant impact on small firms, in a case challenging an FAA regulation on flights over the Grand Canyon (*Grand Canyon Air Tour Coalition v. FAA*).

the rule. While awaiting a decision by the secretary of labor to reopen the rule, OSHA announced on December 18, 1997, a delay of its implementation. The suit brought on behalf of small businesses affected by the rule will be dropped if the rule is reopened for comment and revision.

FAA Admits Adverse Impacts

A new rule first proposed in 1996 by the FAA would have reduced the air space available to air-tour flights over Grand Canyon National Park by 50 percent. This change would have seriously affected small air-tour operators who operate in the park.

When the final rule was first published in December 1996, the FAA certified under the RFA that it would not have a significant economic impact on a substantial number of small entities. This certification came after the chief counsel for advocacy submitted extensive comments to the FAA before the rule was final, pointing to the agency's failure to adequately analyze the economic impact on small entities and to provide regulatory alternatives that would minimize the burden on small firms.

Judging this issue to be ripe for review by a federal court, the Grand Canyon Air Tour Assoc-

iation, the Hualapai Indian Tribe, and other parties brought suit against the FAA in early 1997 in the U.S. Court of Appeals for the D.C. Circuit, citing the agency's failure to consider the proposed rule's impact on them (*Grand Canyon Air Tour Coalition et al. v. FAA et al.*, docket no. 97-1003).

After Chief Counsel Glover notified the court of his intent to file an *amicus curiae* brief regarding the agency's erroneous certification, the FAA and the Department of Justice agreed to admit to the faulty certification before the court and also by publication in the *Federal Register*. Since the November 6, 1997, court date, the FAA has agreed to delay implementation of many parts of its Grand Canyon rule until it can resolve the issue with the small tour operators, Indian tribes, and other affected groups. In addition, the FAA has subsequently participated in regular meetings with Advocacy staff to analyze its compliance with the Regulatory Flexibility Act for every new rulemaking.

The bottom line: federal agencies' regulatory culture is being fundamentally changed as a result of the 1996 amendments to the Regulatory Flexibility Act.

Editor Sarah Fleming

Managing Editor John Ward

Contributing Editor Kathryn Tobias

Production Assistants Darlene Mahmoud

Director, Office of Public Liaison
Anita Drummond

The Small Business Advocate (ISSN 1045-7658) is published monthly by the U.S. Small Business Administration's Office of Advocacy and is distributed to Small Business Administration field staff and members of the U.S. Congress. *The Small Business Advocate* is available without charge from the Office of Advocacy, U.S. Small Business Administration, Mail Code 3114, Washington, DC 20416. Back issues are available on microfiche from the National Technical Information Service, 5285 Port Royal Road, Springfield, VA 22161.

Send address changes to: The Small Business Advocate, Mail Code 3114, U.S. Small Business Administration, Washington, DC 20416. Include your current address label.

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Economic News

For Many Home-Based Businesses, It's a Full-Time Job

About 30 percent of owners of home-based businesses work more than 40 hours per week, according to new calculations made by the Office of Advocacy from data collected by the Census Bureau. Of 125,000 business owners surveyed by the Census Bureau in 1996, more than half (56 percent) reported operations from the home. Of these, approximately 30 percent operated full-time, using a 40-hour workweek as the benchmark for full-time operation.

Chief Counsel for Advocacy Jere W. Glover described the numbers gleaned from this survey as "a potential gold mine" for information about serious home-based business activity. The chief counsel asserted that such home-based businesses should be encouraged and supported by good public policy. "An example of recent support for these fledgling companies" said Glover, "is the new Taxpayer Relief Act of 1997 — favored by both Congress and the Administration — which expands deductions for home-based business owners."

The data used for Advocacy's calculations was drawn from the Census Bureau's *Characteristics of Business Owners*, a part of the 1992 Economic Census. The special calculations were created under contract with the Office of Advocacy and the Department of Commerce's Minority Business Development Agency.

One unique aspect of the survey numbers is the inclusion, for the first time since 1987, of data on minority home-based business owners. Of the 125,000 business owners surveyed, Hispanic, African-American, Asian, women, and non-minority males accounted for 25,000 respondents apiece.

Some highlights include:

- Of the 30 percent of full-time home-based business owners, about 12 percent produced a product or service, about 14 percent used the home for clerical work, and about 5 percent telecommuted.

- Women owners (about 15 percent of all owners of full-time home-based businesses) were most likely to produce a product or service in the home. They were the least likely, depending on the industry, to use their homes for clerical tasks.

- About 11 percent of Hispanic and African-American owners reported that they manufactured a product or service in the home.

- In sectors such as construction and retail trade, the percentage of owners of full-time home-based businesses using the home for production ranged between 4 and 12 percent, varying by demographic group.

- About 14 percent of all owners of full-time home-based businesses used the home for clerical duties. Clerical tasks — rather than production or telecommuting tasks — were more likely to be performed by employees working in home-based firms.

- Many of the full-time home-based firms employed fewer than four workers. But, somewhat surprisingly, about half the full-time firms that had business activities outside of the home employed between 5 and 20 workers.

Information on *Characteristics of Business Owners* is available on the Census Bureau's Web site at <http://www.census.gov/agfs/www/cbo.html>. Questions about the Office of Advocacy's calculations may be directed to Bruce D. Phillips, director of Advocacy's Office of Economic Research, by e-mail at bruce.phillips@sba.gov.

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<http://www.sbaonline.sba.gov>

Research and Publications

Burdensome Administrative, Engineering Costs to Be Detailed in Upcoming Report

According to preliminary findings of the latest research sponsored by the Office of Advocacy, fixed administrative processes and engineering controls required by federal regulations top the list of requirements that have the most disproportionate burden on small businesses.

The work in progress, *Studies of the Impacts of Federal Regulations, Paperwork, and Tax Requirements for Small Business*, will be an intensive “micro” examination of the effect of regulations on small businesses. The report will produce estimates of the differential regulatory burden, by firm size, imposed by individual federal regulations and the Internal Revenue Service’s paperwork requirements.

The study’s chief researcher, Dr. Henry Beale of Microeconomic Applications, Inc., is computing the regulatory costs per employee (or, if more appropriate, per dollar of sales) and comparing these costs across business size classes. This approach will ultimately make it possible to estimate disproportionate impacts on small business as percentages of mean (average) impacts.

“The study under way scrutinizes the many aspects that go into regulatory compliance,” said Chief Counsel for Advocacy Jere W. Glover. “It’s not just tangible or obvious things, like machinery or training, that figure into the costs of compliance. It’s processes. It’s time.” Also, according to Beale, the study will aim at “producing estimates that can be extrapolated to an industry as a whole and be updated as needed.”

The Office of Advocacy — created by an act of Congress in 1976 as an independent office within the U.S. Small Business Administration

New research sponsored by the Office of Advocacy shows that administrative and engineering costs top the list of burdens imposed by regulation on small business.

— is mandated to represent the nation’s small businesses within the federal government. One way the Office of Advocacy serves as a watchdog is through the economic research and analysis it conducts on laws and regulations that may significantly affect small firms. The potential for regulatory and reporting requirements to have dispropor-

Accessing Advocacy Research

For over two decades, the Office of Advocacy has funded research into the effects of regulation on small business. This research has proven crucial in crafting many of the regulatory relief measures that have been put before Congress and subsequently implemented.

To take a look at abstracts of this research, go to the Office of Advocacy’s Internet site, <http://www.sba.gov/ADVO/>.

Advocacy’s research can also be accessed through a printed guide, the 1995 edition of the *Catalog of Small Business Research*. It contains descriptions of over 500 research reports. Copies are available by writing to: Catalog (M.C. 3114), U.S. Small Business Administration, Washington, DC 20416.

tionate effects on small businesses is an issue that has long been a concern of the Office of Advocacy: since 1976, the Office of Advocacy has undertaken some 70 studies on regulatory compliance burdens on small firms (see sidebar on this page).

The new Advocacy-sponsored study focuses on regulations that concern worker safety and health, the environment, food labeling and safety, and paperwork burdens associated with tax payments and related activities. The different types of factors that contribute to disproportionately high regulatory costs for small businesses come in different mixes — technical economies of scale, administrative and development costs, statistical factors, and population of small governmental entities — which may make them difficult to assess. But there are some discernible patterns. In their pure form, the types of regulatory costs that impose the most disproportionately high burden on small entities include fixed administrative costs (such as paperwork and hazard assessment) and technical economies of scale. In terms of absolute disproportionate impacts on small entities, engineering costs generally represent the largest burden on small firms.

Dr. Beale’s review indicates that economies of scale in engineering controls were generally substantial sources — and could be extremely large sources — of disproportionately high compliance costs for small entities. Regulations for which technical economies of scale in engineering control equipment caused nearly all of the disproportionately high costs included:

- **Effluent guidelines of the**

Environmental Protection Agency (EPA). Small entities (defined as those discharging less than five million pounds per year) that are direct dischargers pay 37.9 times more per employee than large businesses. Small indirect dischargers pay 66.6 times more than their larger counterparts.

• **Electrical safety-related work practices mandated by the Occupational Safety and Health Administration (OSHA).** So-called “lockout/tagout” provisions cost small meatpacking businesses

(defined as firms with less than three employees) 17.3 times more per employee than large meatpacking companies. These same provisions cost small manufacturers of household electrical appliances 22 times more per employee.

The extensive study undertaken by Dr. Beale will provide objectives and summaries of numerous regulations promulgated by the OSHA, the EPA, the Department of Agriculture, the Food and Drug Administration, and the Internal Revenue Service. In addition to calculating the cost impacts of the individual

regulations on small establishments, Dr. Beale will conclude each chapter with an assessment of each agency’s regulatory approach.

The full report is expected to be published in late 1998, and its findings will be featured in a future issue of *The Small Business Advocate*. For more details, contact Bruce Phillips, director of Advocacy’s Office of Economic Research, by e-mail at bruce.phillips@sba.gov.

New Advocacy Publication Looks at Characteristics of Owners and Employees

Small businesses’ contributions to the national economy include hiring individuals who might otherwise be unemployed, according to a new report just released by the Office of Advocacy. Covering the period 1992–1996, the report — entitled *Characteristics of Small Business Employees and Owners* — details the differences between the small- and large-firm work forces and also presents various attributes of small business owners.

The new report clearly illustrates that, compared with large firms, small firms hire a larger proportion of employees who work part-time, are under age 25, are over age 65, are high school graduates or have less education, and are on public assistance. The report also underscores the disparities between large and small firms in providing employee benefits.

Chief Counsel for Advocacy Jere W. Glover noted the policy implications of the data included in the report: “These data demonstrate the soundness of linking job creation initiatives to small business. Not only do small firms hire and train most new workers; they also hire

more workers coming off welfare. The statistics also reinforce the argument that obstacles must be overcome that hamper small business efforts to provide pension and health care benefits.”

The report points out that a wide range of individuals are taking advantage of opportunities in small business ownership. Of the 11.3 million self-employed individuals with earnings in 1996, 37.4 percent were women, 6.0 percent were black, 5.9 percent had Hispanic origins, 5.7 percent were under age 25, 6.8 percent were over age 65, 40.4 percent were high school graduates or had fewer years of education, and 24.7 percent earned more than \$25,000. Also, 75.5 percent of the businesses in existence in 1992 survived at least through 1996.

For employee characteristics, data sources for the report include the March releases of the Current Population Survey for 1993 through 1997, a joint project of the Bureau of Labor Statistics and the Census Bureau. For business owner characteristics, data were drawn from *Characteristics of Business Owners 1992*, a survey conducted by the

Census Bureau with funding from the Office of Advocacy and the Commerce Department’s Minority Business Development Agency.

Technical questions about the report may be addressed to Brian Headd, economist in Advocacy’s Office of Economic Research, at (202) 205-6953, or by e-mail at brian.headd@sba.gov.

How to Get the Report

The full text of *Characteristics of Small Business Employees and Owners* is available on the the Office of Advocacy’s Internet site at <http://www.sba.gov/ADVO/stats/>.

Paper or microfiche copies of the report are also available for purchase from the National Technical Information Service at (703) 605-6000. Ask for publication no. PB98-127111. The cost is \$21.50 for a paper copy; \$10 for a microfiche copy, plus postage and handling.

Regulatory Agencies

New FDA Regs Will Be Costly for Small Businesses

Two new rulemakings proposed recently by the Food and Drug Administration (FDA) would impose extensive labeling requirements for dietary supplements and rubber latex medical devices. Responding in comment letters to the FDA, the SBA's chief counsel for advocacy asserted that the FDA's economic impact analyses, required by the Regulatory Flexibility Act (RFA), are less than satisfactory and do not remove the concern that the new labeling requirements could prove disproportionately and significantly costly to numerous small firms.

Focused primarily on the FDA's inadequate efforts to comply with the RFA, Chief Counsel for Advocacy Jere W. Glover's message was clearly a serious caution to the FDA that failure to comply with the RFA is judicially reviewable (see the box on page 7 for important information on the RFA).

Dietary supplements. On June 4, 1997, the FDA published a proposed rule concerning the regulation of dietary supplements containing ephedrine alkaloids (from botanical sources rather than pharmaceutical sources). The massive regulation is designed to address certain incidents of illness, injury, and death purportedly associated with the use of dietary supplement products containing ephedrine alkaloids. The new regulation would impose labeling requirements for dietary supplements that contain ephedrine alkaloids, which could place significant cost burdens on small firms.

Addressing this concern, Chief Counsel for Advocacy Jere W. Glover submitted extensive com-

New labeling requirements have been proposed by the Food and Drug Administration. Here is what the Office of Advocacy is doing to make sure that their impact on small firms will be taken into account.

ments to the FDA in a letter of Feb. 3, 1998. The chief counsel focused first on the FDA's efforts to comply with the RFA. Glover reminded the FDA that, upon publishing a proposed rule in the *Federal Register*, the RFA requires that an agency head must either certify that a proposed rule will not have a significant economic impact on a substantial number of small entities, or prepare an initial regulatory flexibility analysis (IRFA). The chief counsel wrote:

"Having determined that the rule would have a significant economic impact, the FDA correctly chose the option to perform an IRFA. However . . . [the] FDA has done an inadequate job of analyzing the impact of the regulation on small entities and in identifying and analyzing less burdensome alternatives."

In addition, the chief counsel was critical of the methodology used by the FDA to determine that a rule was needed and further described the FDA's analysis as "misleading for reasons already acknowledged by FDA." According to Glover, "The FDA relies on adverse event reports to suffice as evidence of the need for the regulation . . . [which] by FDA's own

admission are not a reliable source of data upon which to draw conclusions regarding the health effects of a particular substance."

The chief counsel urged the FDA to complete a full analysis on the effects of the proposed rule on small firms and to develop significant regulatory alternatives before publishing a final rule.

Latex rubber medical devices. On Sept. 30, 1997, the FDA published a final rule requiring user labeling for rubber-containing medical devices. The goal of the rule is to alert users who may be allergic to natural rubber latex to the fact that certain products contain possible allergens. While the rule may be appropriate, according to the chief counsel, the agency did not comply with the RFA and assess the cost imposed on small businesses as a result of the new labeling requirements.

In comments submitted to the FDA on Oct. 7, 1997, Chief Counsel Glover expressed concern that the FDA had not provided sufficient data and analysis concerning the proposed rule's impact on small business. "An agency must first determine the number of small entities affected . . . the FDA failed to indicate in either the proposed or the final rule the number of entities affected — small or large," wrote Glover.

Bolstering the chief counsel's argument were the hard facts: according to information from the Office of Advocacy's data base, in 1993 there were 989 firms in the business of fabricating rubber products. Some 90.4 percent of all rubber fabricators have fewer than 500 employees and are considered small

under SBA regulations. They account for 46.5 percent of industry employment.

Glover further emphasized that to comply with the certification requirements of the RFA, an agency must also make a preliminary assessment of the cost of the rule and determine whether the cost will disproportionately affect small entities. "There is no mention in the proposed rule regarding the likely cost of the regulation," said Glover. In the final rule, the agency mentions for the first time that the cost for the labeling change would range from \$1,000 to \$2,000 for each type of device labeled. According to the chief counsel, this new information comes only in response to an industry comment on the proposed rule that the change would cost as much as \$15,000 per device.

"The agency," said Glover, "neither provides data to rebut the industry's claim regarding cost, nor . . . data to support its own claim

regarding cost. Moreover, assuming that the agency's estimates are correct, if a small entity manufactures more than one type of device, even \$2,000 per device could be quite significant." Glover reminded the agency that the RFA compliance is subject to judicial review.

Both comment letters may be viewed in their entirety at Advocacy's home page, located at <http://www.sba.gov/ADVO/>. For more information on these FDA rules, contact Shawne Carter McGibbon, assistant chief counsel for food, drug, and health policy, at (202) 205-6533; or by e-mail at shawne.carter@sba.gov.

The RFA: How It Works for Small Business

The Office of Advocacy tracks regulatory activities of federal agencies to assess whether they are in compliance with the Regulatory Flexibility Act (RFA). The law requires federal agencies to determine if a new rule will have a significant economic impact on a substantial number of small entities and, if so, to explore alternative regulations. Advocacy received some extra muscle for this work with the passage of the Small Business Regulatory Enforcement Fairness Act of 1996 (SBREFA), which amended the RFA to include provisions for judicial review of federal regulations. In other words, under SBREFA, small businesses may challenge the analyses of federal

agencies in court.

The obligations of agencies and the rights of regulated small businesses are explained in *A Guide to the Regulatory Flexibility Act*, a publication of the Office of Advocacy. This publication can be found on Advocacy's home page at <http://www.sba.gov/ADVO/laws/flex/rfrguide.html>. Requests may also be faxed to the Office of Advocacy at (202) 205-6928. A full listing of comments filed on federal rulemakings issued during 1997 also can be found on the home page.

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Technology Talk

The ACE-Net Short Form: Streamlining Small Companies' Stock Offerings

by Terry Bibbens

Small companies seeking up to \$1 million in equity capital will now be able to list their offerings nationwide under a new, simplified, low-cost procedure that will place their company on the Internet site of ACE-Net.

ACE-Net, the Access to Capital Electronic Network, is an Internet-based service developed by the Office of Advocacy in response to a growing need for a national small business securities market that was articulated by delegates to the 1995 White House Conference on Small Business. It allows small, growing companies seeking equity capital to list profiles of their companies on a secure Internet site, and gives accredited investors access to that information.

ACE-Net has been in "beta site" development for the past six months, and 25 small companies have assisted in the pilot phase of the program by completing an online long form (the U-7 form), a 50 question-and-answer style document designed by the North American Securities Administrators Association and the American Bar Association

to standardize public securities offerings.

The new ACE-Net short form will allow small companies seeking up to \$1 million in equity capital to fill out a four-page document (with an attached business plan/executive summary) that should require less than one day to complete online (after appropriate legal review). About 85 percent of the companies listing on the ACE-Net pilot program were seeking less than \$1 million and will be eligible to use the new ACE-Net short form.

After payment of a \$450 fee, companies get quick entry to the Internet system. This represents a great value to entrepreneurs and a dramatic streamlining of the securities process in 15 states. Instead of being required to register in each individual state, an entrepreneur can register once using the ACE-Net short form for securities offerings that incorporates the Accredited Investor/Qualified Purchaser/ACE-Net Exemptions adopted by these 15 states. Other states are in the process of adopting similar exemptions.

This electronic market is design-

ed for the so-called "gazelles," rapidly growing small companies that have added about 70 percent of the 11.2 million new jobs created in the United States between 1992 and 1996. Many of these gazelles are located in regions where venture capital firms are not present, and where venture capital investment is a rarity. Institutional venture capital funds are financing only about 3,000 of these companies each year. Attracting equity capital from state venture funds, Small Business Investment Companies, and private angel investors is vital to their continued growth. This is where ACE-Net comes in.

Terry Bibbens is the Office of Advocacy's entrepreneur in residence.

For More Information

For more complete information on the new short form and the states participating in ACE-Net, go to its home page at <http://www.sba.gov/ADVO/acenet.html>.

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